

U.S. DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

2022 NOV 10 P 12:00

cc

CAROL L. MURPHY

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

BILL OF INFORMATION FOR ACCESS DEVICE FRAUD

UNITED STATES OF AMERICA

\*

CRIMINAL NO.

**22-243**

v.

\*

SECTION:

**SECT. T MAG. 5**

ALICE C. "SHANNON" CHABAUD

\*

VIOLATIONS:

18 U.S.C. § 1029(a)(2)

18 U.S.C. § 1029(c)(1)(A)(i)

\* \* \*

The United States Attorney charges that:

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN:

1. The term "access device" meant any card, plate, code, account number, electronic serial number, personal identification number, or other means of account access that can be used, alone or in conjunction with another access device, to obtain money, goods, services, or any other thing of value, or that can be used to initiate a transfer of funds (other than a transfer originated solely by paper instrument).

Fee \_\_\_\_\_  
Process \_\_\_\_\_  
X Dktd \_\_\_\_\_  
CtRmDep \_\_\_\_\_  
Doc.No. \_\_\_\_\_

2. Regions Bank was a financial institution headquartered in Birmingham, Alabama, that engaged in interstate commerce.

3. The defendant, **ALICE C. “SHANNON” CHABAUD (“CHABAUD”)**, was a resident of New Orleans, Louisiana, and a certified public accountant.

4. Band A was a music band based in New Orleans. Band members retained **CHABAUD** as their accountant in or around 2006. As part of her employment with Band A, **CHABAUD** had been given access to Band A’s bank accounts at Regions Bank.

5. Band A ended **CHABAUD**’s employment on or about September 21, 2015. **CHABAUD** did not relinquish her access to Band A’s bank accounts, however.

6. After her termination by Band A, **CHABAUD** used Band A’s bank account numbers and other account information without Band A’s authorization in order to access Band A’s accounts and divert funds from those accounts for her own benefit. **CHABAUD** also communicated with others outside of Louisiana in furtherance of the scheme to defraud Band A.

7. Between September 21, 2015, and May 26, 2020, **CHABAUD** fraudulently diverted a total of \$207,607.95 from Band A’s bank accounts for her own personal use.

**B. THE OFFENSE OF ACCESS DEVICE FRAUD**

On or about April 22, 2019, in the Eastern District of Louisiana, and elsewhere, **CHABAUD**, did knowingly and with the intent to defraud, use unauthorized access devices, specifically bank account numbers and other bank account information for Band A, and by such conduct, from on or about April 22, 2019, and ending on or about April 21, 2020, obtained U.S. currency, the aggregate value of which was \$1,000.00 or greater, in a manner affecting interstate commerce; in violation of Title 18, United States Code, Sections 1029(a)(2) and (c)(1)(A)(i).

**NOTICE OF FORFEITURE**

1. The allegation of Count 1 of this Bill of Information is incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.

2. As a result of the offense alleged in Count 1, the defendant, **ALICE C. "SHANNON" CHABAUD**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(2)(B), any property constituting or derived from proceeds obtained directly or indirectly, and any personal property used or intended to be used to commit the offense, including but not limited to any of the following:

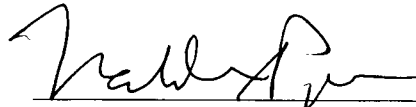
\$207,607.95 in United States currency.

3. If any of the above-described property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

the United States shall seek a money judgment and, pursuant to Title 21, United States Code, Section 853(p), forfeiture of any other property of the defendant up to the value of said property.

DUANE A. EVANS  
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read "Matthew R. Payne", written over a horizontal line.

MATTHEW R. PAYNE  
La. Bar Roll No. 32631  
Assistant United States Attorney

New Orleans, Louisiana  
November 10, 2022